

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 22-CR-80173-AMC

UNITED STATES OF AMERICA,

vs.

WILLIAM MICHAEL SPEARMAN,

STIPULATION REGARDING RESTITUTION

The United States of America, by and through the undersigned Assistant United States Attorney, and the defendant, William Michael Spearman, by and through his counsel, Assistant Federal Public Defender Scott Berry, hereby jointly recommend that this Honorable Court enter an order of restitution for the defendant, William Michael Spearman in the total amount of \$123,500 (USD), to pay an apportioned amount of restitution to the victims in this case.

The parties stipulate that pursuant to the Mandatory Restitution for Sex Crimes section of the Violence Against Women Act of 1994 (VAWA), codified in Title 18, United States Code § 2259, that the minors from the “8 Kids1”, “8 Kids2”, “8 Kids3”, “8 Kids4”, “8 Kids5”, “Zoo Family1”, “Angela”, “April”, “MotorCouch1”, “Lighthouse3”, “2crazygurls”, “Cindy”, “BluesPink1”, “BluePillow1”, “Rap72”, “Jenny”, “SurferHair”, “RapJerseys”, “Vicky”, “Best Necklace”, “Lighthouse1”, “Sweet White Sugar”, “Marineland”, “Jan_Socks3”, “J_Blonde”, “PinkHeartSisters2”, and “Linda&Patty1” series, are victims harmed by the defendant's offense conduct in this case and agree that the defendant, William Michael Spearman, is to be held liable for restitution to and based on the stipulations of the parties.

The parties stipulate that the defendant should pay an apportioned amount of restitution in the following amount:

- 1. \$3000 to “John Doe 1” of the “8 Kids1” series:**

2. \$3500 to “John Doe 2” of the “8 Kids2” series;
3. \$3000 to “John Doe 3” of the “8 Kids3” series;
4. \$5000 to “John Doe 4” of the “8 Kids4” series;
5. \$3000 to “John Doe 5” of the “8 Kids5” series;
6. \$5000 to “Ali” of the “Zoo Family1” series;
7. \$4000 to “Angela” of the “Angela” series;
8. \$5000 to “April” of the “April” series;
9. \$3000 to “Cara” of the “MotorCouch1” series;
10. \$3000 to “Casseaopeia” of the “Lighthouse3” series;
11. \$5000 to “Chelsea” of the “2crazygurls” series;
12. \$3000 to “Cindy” of the “Cindy” series;
13. \$3000 to “Fiona” of the “BluesPink1” series;
14. \$5000 to “Henley” of the “BluePillow1” series;
15. \$5000 to “Jack” of the “Rap72” series;
16. \$10000 to “Jenny” of the “Jenny” series;
17. \$5000 to “Jessy” of the “SurferHair” series;
18. \$5000 to “Kauzie” of the “RapJerseys” series;
19. \$10,000 to “Lily” of the “Vicky” series;
20. \$4000 to “Maria” of the “Best Necklace” series;
21. \$3000 to “Maureen” of the “Lighthouse1” series;
22. \$5000 to “Pia of the “Sweet White Sugar” series;
23. \$5000 to “Sarah of the “Marineland” series;
24. \$4000 to “Skylar” of the “Jan_Socks3” series;
25. \$5000 to “Solomon” of the “J_Blonde” series;
26. \$5000 to “Tori” of the PinkHeartSisters2” series; and
27. \$4000 to “Patty” of the “Linda&Patty1” series;

The parties agree that the mandatory restitution section of the Violence Against Women Act of 1994 (“VAWA”) codified at Title 18, United States Code, Section 2259, requires the Court to impose restitution for any offense under Chapter 110.

The parties agree that the offenses for which the defendant was convicted, namely The offenses for which the Defendant was convicted, namely child exploitation enterprise, in violation of 18 U.S.C. § 2252A(g); is an offense codified in Chapter 110 and is an offense that is subject to the Mandatory Restitution for Sex Crimes section of the VAWA, under Title 18, United States Code

§ 2259.

Furthermore, Title 18, United States Code, section 2259(c) defines a “victim” as an individual “harmed as a result of a commission of a crime” under Chapter 110, including a victim who is under eighteen (18) years of age, incompetent, incapacitated or deceased, the legal guardian of the victim or representative of the victim's estates.

Restitution, pursuant to Title 18, United States Code, Section 2259, is available to victims who are harmed as a proximate result of a Chapter 110 offense.

Defendants convicted of Chapter 110 offenses must compensate for the full amount of the victim's losses, including:

- (A) Medical services relating to physical, psychiatric, or psychological care;
- (B) physical and occupational therapy or rehabilitation
- (C) necessary transportation, temporary housing, and childcare expenses;
- (D) lost income;
- (E) attorney's fees, as well as other costs incurred; and
- (F) any other losses suffered by the victim a proximate result of the offense.

18 U.S.C. §2259(b)(2).

Title 18, United States Code, Section 3664(h), which is incorporated by Title 18, United States Code, Section 2259(b)(2), allows the court to apportion liability among defendants to reflect the level of contribution to the victims' loss and economic circumstances of each defendant.

There is no dispute that the defendant possessed on his computer images of child pornography that depicted the victims of the “**8 Kids1**”, “**8 Kids2**”, “**8 Kids3**”, “**8 Kids4**”, “**8 Kids5**”, “**Zoo Family1**”, “**Angela**”, “**April**”, “**MotorCouch1**”, “**Lighthouse3**”, “**2crazygurls**”, “**Cindy**”, “**BluesPink1**”, “**BluePillow1**”, “**Rap72**”, “**Jenny**”, “**SurferHair**”, “**RapJerseys**”, “**Vicky**”, “**Best Necklace**”, “**Lighthouse1**”, “**Sweet White Sugar**”, “**Marineland**”, “**Jan_Socks3**”, “**J_Blonde**”, “**PinkHeartSisters2**”, and “**Linda&Patty1**” series, are victims

being sexually abused.

There is no dispute that harm was caused to the victims of the “8 Kids1”, “8 Kids2”, “8 Kids3”, “8 Kids4”, “8 Kids5”, “Zoo Family1”, “Angela”, “April”, “MotorCouch1”, “Lighthouse3”, “2crazygurls”, “Cindy”, “BluesPink1”, “BluePillow1”, “Rap72”, “Jenny”, “SurferHair”, “RapJerseys”, “Vicky”, “Best Necklace”, “Lighthouse1”, “Sweet White Sugar”, “Marineland”, “Jan_Socks3”, “J_Blonde”, “PinkHeartSisters2”, and “Linda&Patty1” series by persons who possess, disseminate or share the images of the victims of the “8 Kids1”, “8 Kids2”, “8 Kids3”, “8 Kids4”, “8 Kids5”, “Zoo Family1”, “Angela”, “April”, “MotorCouch1”, “Lighthouse3”, “2crazygurls”, “Cindy”, “BluesPink1”, “BluePillow1”, “Rap72”, “Jenny”, “SurferHair”, “RapJerseys”, “Vicky”, “Best Necklace”, “Lighthouse1”, “Sweet White Sugar”, “Marineland”, “Jan_Socks3”, “J_Blonde”, “PinkHeartSisters2”, and “Linda&Patty1” series being sexually abused as a child. The parties agree that the victims of the “8 Kids1”, “8 Kids2”, “8 Kids3”, “8 Kids4”, “8 Kids5”, “Zoo Family1”, “Angela”, “April”, “MotorCouch1”, “Lighthouse3”, “2crazygurls”, “Cindy”, “BluesPink1”, “BluePillow1”, “Rap72”, “Jenny”, “SurferHair”, “RapJerseys”, “Vicky”, “Best Necklace”, “Lighthouse1”, “Sweet White Sugar”, “Marineland”, “Jan_Socks3”, “J_Blonde”, “PinkHeartSisters2”, and “Linda&Patty1” series knowledge that images of their individual abuse were being disseminated and possessed by others caused the victims of “8 Kids1”, “8 Kids2”, “8 Kids3”, “8 Kids4”, “8 Kids5”, “Zoo Family1”, “Angela”, “April”, “MotorCouch1”, “Lighthouse3”, “2crazygurls”, “Cindy”, “BluesPink1”, “BluePillow1”, “Rap72”, “Jenny”, “SurferHair”, “RapJerseys”, “Vicky”, “Best Necklace”, “Lighthouse1”, “Sweet White Sugar”, “Marineland”, “Jan_Socks3”, “J_Blonde”, “PinkHeartSisters2”, and “Linda&Patty1” series to be re-victimized and has resulted in harm that is distinct from that suffered from the actual physical sexual abuse sustained as a child. Accordingly, the parties agree

the victims of the **“8 Kids1”, “8 Kids2”, “8 Kids3”, “8 Kids4”, “8 Kids5”, “Zoo Family1”, “Angela”, “April”, “MotorCouch1”, “Lighthouse3”, “2crazygurls”, “Cindy”, “BluesPink1”, “BluePillow1”, “Rap72”, “Jenny”, “SurferHair”, “RapJerseys”, “Vicky”, “Best Necklace”, “Lighthouse1”, “Sweet White Sugar”, “Marineland”, “Jan_Socks3”, “J_Blonde”, “PinkHeartSisters2”, and “Linda&Patty1”** series were harmed as a result of the criminal conduct engaged in by the defendant, William Michael Spearman.

There is no dispute that other individuals have been charged and convicted in multiple Districts with possessing, receiving, and/or disseminating child pornography wherein the victims of the **“8 Kids1”, “8 Kids2”, “8 Kids3”, “8 Kids4”, “8 Kids5”, “Zoo Family1”, “Angela”, “April”, “MotorCouch1”, “Lighthouse3”, “2crazygurls”, “Cindy”, “BluesPink1”, “BluePillow1”, “Rap72”, “Jenny”, “SurferHair”, “RapJerseys”, “Vicky”, “Best Necklace”, “Lighthouse1”, “Sweet White Sugar”, “Marineland”, “Jan_Socks3”, “J_Blonde”, “PinkHeartSisters2”, and “Linda&Patty1”** series is a victim.

There is no dispute that the amounts of restitution recited herein reflect the respective victims’ losses as proximately caused by the defendant William Michael Spearman.

The parties agree that the defendant, William Michael Spearman, is liable for a portion of that total loss caused to the victims of the **“8 Kids1”, “8 Kids2”, “8 Kids3”, “8 Kids4”, “8 Kids5”, “Zoo Family1”, “Angela”, “April”, “MotorCouch1”, “Lighthouse3”, “2crazygurls”, “Cindy”, “BluesPink1”, “BluePillow1”, “Rap72”, “Jenny”, “SurferHair”, “RapJerseys”, “Vicky”, “Best Necklace”, “Lighthouse1”, “Sweet White Sugar”, “Marineland”, “Jan_Socks3”, “J_Blonde”, “PinkHeartSisters2”, and “Linda&Patty1”** series. The defendant, William Michael Spearman, agrees to pay restitution, and the parties request that the Court order restitution, in the following amounts:

1. \$3000 to “John Doe 1” of the “8 Kids1” series, made payable to counsel, “Tanya Hankins in Trust for the 8 Kids1 Series” and mailed to The Law Office of Erik Bauer, P.O. Box 1091, Tacoma, Washington, 98401
2. \$3500 to “John Doe 2” of the “8 Kids2” series, made payable to counsel, “Tanya Hankins in Trust for the 8 Kids2 Series” and mailed to The Law Office of Erik Bauer, P.O. Box 1091, Tacoma, Washington, 98401
3. \$3000 to “John Doe 3” of the “8 Kids3” series, made payable to counsel, “Tanya Hankins in Trust for the 8 Kids3 Series” and mailed to The Law Office of Erik Bauer, P.O. Box 1091, Tacoma, Washington, 98401
4. \$5000 to “John Doe 4” of the “8 Kids4” series, made payable to counsel, “Tanya Hankins in Trust for the 8 Kids4 Series” and mailed to The Law Office of Erik Bauer, P.O. Box 1091, Tacoma, Washington, 98401
5. \$3000 to “John Doe 5” of the “8 Kids5” series, made payable to counsel, “Tanya Hankins in Trust for the 8 Kids5 Series” and mailed to The Law Office of Erik Bauer, P.O. Box 1091, Tacoma, Washington, 98401
6. \$5000 to “Ali” of the “Zoo Family1” series, made payable to counsel, “Moore & Van Allen in trust for Ali of ZooFamily1” and mailed to Moore & Van Allen PLLC, Attn: Sarah Byrne/049549.1, 100 N. Tryon Street, Suite 4700, Charlotte, NC 28202;
7. \$4000 to “Angela” of the “Angela” series, made payable to counsel, “Restore the Child in Trust for Angela” and mailed to Restore the Child, PLLC, 2522 N. Proctor St., Ste 85, Tacoma, WA 98406;
8. \$5000 to “April” of the “April” series, made payable to counsel, “Restore the Child in Trust for April” and mailed to Restore the Child, PLLC, 2522 N. Proctor St., Ste 85, Tacoma, WA 98406;
9. \$3000 to “Cara” of the “MotorCouch1” series, made payable to counsel, “Carol L. Hepburn I/T/F Cara” and mailed to Carol L. Hepburn, P.S., PO Box 17718, Seattle, WA 98127;
10. \$3000 to “Casseaopeia” of the “Lighthouse3” series, made payable to counsel, “Marsh Law Firm PLLC in trust for Casseaopeia” and mailed to “Marsh Law Firm PLLC, ATTN: Casseaopeia, PO Box 4668 #65135, New York, NY 10163-4668;
11. \$5000 to “Chelsea” of the “2CrazyGurls” series, made payable to counsel, “Restore the Child in Trust for Chelsea” and mailed to Restore the Child, PLLC, 2522 N. Proctor St, Ste 85, Tacoma, Washington, 98406;
12. \$3000 to “Cindy” of the “Cindy” series, made payable to counsel, “Cusack & Gilfillan LLC for Cindy” and mailed to Cusack & Gilfillan, LLC, 411 Hamilton Blvd., Suite 1510, Peoria, IL 61602;
13. \$5000 to “Fiona” of the “BluesPink1” series, made payable to counsel, “Marsh Law Firm PLLC in trust for Fiona” and mailed to Marsh Law Firm PLLC, ATTN: Casseaopeia, PO Box 4668 #65135, New York, NY 10163-4668;
14. \$5000 to “Henley” of the “BluePillow1” series, made payable to counsel, “Deborah A. Bianco, in trust for Henley” and mailed to Deborah A. Bianco, P.S., PO Box 6503, Bellevue, WA 98008;

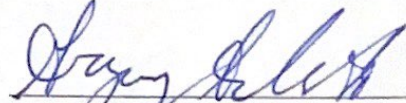
15. \$5000 to “Jack” of the “Rap72” series, made payable to counsel, “Deborah A. Bianco, in trust for Jack” and mailed to Deborah A. Bianco, P.S., PO Box 6503, Bellevue, WA 98008;
16. \$10000 to “Jenny” of the “Jenny” series, made payable to counsel, “Marsh Law Firm PLLC in trust for Jenny” and mailed to Marsh Law Firm PLLC, ATTN: Jane, PO Box 4668 #65135, New York, NY 10163-4668;
17. \$5000 to “Jessy” of the “SurferHair” series, made payable to counsel, “Deborah A. Bianco, in trust for Jessy” and mailed to Deborah A. Bianco, P.S., PO Box 6503, Bellevue, WA 98008;
18. \$5000 to “Kauzie” of the “RapJerseys” series, made payable to counsel, “Deborah A. Bianco, in trust for Kauzie” and mailed to Deborah A. Bianco, P.S., PO Box 6503, Bellevue, WA 98008;
19. \$10000 to “Lily” of the “Vicky” series, made payable to counsel, “Carol L. Hepburn I/T/F Maria” and mailed to Carol L. Hepburn, P.S., PO Box 17718, Seattle, WA 98127;
20. \$4000 to “Maria” of the “Best Necklace” series, made payable to counsel, “Carol L. Hepburn I/T/F Maria” and mailed to Carol L. Hepburn, P.S., PO Box 17718, Seattle, WA 98127;
21. \$3000 to “Maureen” of the “Lighthouse1” series, made payable to counsel, “Deborah A. Bianco, in trust for Maureen” and mailed to Deborah A. Bianco, P.S., PO Box 6503, Bellevue, WA 98008;
22. \$5000 to “Pia of the “Sweet White Sugar” series, made payable to counsel, “Deborah A. Bianco, in trust for Pia” and mailed to Deborah A. Bianco, P.S., PO Box 6503, Bellevue, WA 98008;
23. \$5000 to “Sarah of the “Marineland” series, made payable to counsel, “Carol L. Hepburn I/T/F Sarah” and mailed to Carol L. Hepburn, P.S., PO Box 17718, Seattle, WA 98127;
24. \$4000 to “Skylar” of the “Jan_Socks3” series, made payable to counsel, “Carol L. Hepburn I/T/F Skylar” and mailed to Carol L. Hepburn, P.S., PO Box 17718, Seattle, WA 98127;
25. \$5000 to “Solomon” of the “J_Blonde” series, made payable to counsel, “Carol L. Hepburn I/T/F Solomon” and mailed to Carol L. Hepburn, P.S., PO Box 17718, Seattle, WA 98127;
26. \$5000 to “Tori” of the PinkHeartSisters2” series, made payable to counsel, “Marsh Law Firm PLLC in trust for Tori” and mailed to Marsh Law Firm PLLC, ATTN: Jane, PO Box 4668 #65135, New York, NY 10163-4668; and

27. \$4000 to "Patty" of the "Linda&Patty1" series, made payable to counsel, "Jones Day in trust for Patty" and mailed to Jones Day, Attn: Andrew Bjorklund, 500 Grant Street, Suite 4500, Pittsburgh, PA 15219-2514.

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

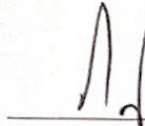
Date: 1/22/24

By:


GREGORY SCHILLER
ASSISTANT UNITED STATES ATTORNEY


Date: 1/22/24

By:


SCOTT BERRY
ASSISTANT FEDERAL PUBLIC DEFENDER

Date: 1/22/24

By:


WILLIAM MICHAEL SPEARMAN
DEFENDANT